

**EXHIBIT A**

**DIORIO & SERENI LLP**  
ATTORNEYS & COUNSELLORS AT LAW

KATHLEEN E. MAHONEY, ESQUIRE

February 13, 2004

**(Via facsimile 215-545-0423)**

John Rollins, Esquire  
Derek Howard, Esquire  
**HOWARD ROLLINS, LLC**  
262 South 12<sup>th</sup> St., Third Floor  
Philadelphia, PA 19107

**Re: Arthur Jackson, III v. Delaware County, et al.**  
**Civil Action No. 02-3230**

Dear Mr. Rollins and Mr. Howard:

Please be advised that we wish to schedule the depositions of Plaintiff's expert witnesses.  
Please provide us with available dates for the following individuals:

Betsy Bates, BSN, CCRN, CCM  
Andrew C. Verzilli, Ph.D.  
Carol L. Armstrong, Ph.D.  
Lee Silverman, M.D.  
Dan Gzeski, M.D.

The deadline set by the Court to accomplish this is **March 5, 2004**, so your prompt attention to this matter is greatly appreciated.

Thank you for your courtesy and cooperation.

Very truly yours,

**DiORIO & SERENI, LLP**

By: *Kathleen E. Mahoney*  
KATHLEEN E. MAHONEY

KEM/s

cc: David F. White, Esquire / Dennis P. Herbert, Esquire  
- Facsimile transmission (610-941-8133)  
William C. Reil, Esquire  
- Facsimile transmission (215-564-4292)

FRONT & PLUM STREETS • P.O. Box 1789  
MEDIA, PENNSYLVANIA 19063  
(610) 565-5700 • FAX (610) 891-0652  
kmahoney@dioriosereni.com

**EXHIBIT B**

WILLIAM C. REIL  
ATTORNEY AT LAW  
42 S. 15TH STREET, SUITE 210  
PHILADELPHIA, PA 19102

(215) 564-1635  
FAX (215) 564-4292

February 18, 2004

**BY FAX AND REGULAR MAIL**  
610-891-0652

Kathleen Mahoney, Esquire  
DiOrio & Sereni, LLP  
Front & Plum Streets  
P.O. Box 1789  
Media, PA 19063

Re: Arthur Jackson III v. Delaware County Prison, et al  
US District Court Civil Action Number: 02-3230  
Discovery Deadline: 1/16/04; Expert Reports: 1/12/04  
**Expert Deposition of Plaintiff's Witnesses**

Dear Ms. Mahoney:

I write to you in reply to your letter of February 13, 2004. With respect to your request to depose the five expert witnesses of plaintiff who have submitted reports, I indicate that we have written to these experts concerning their availability and fees for their depositions. By the way, I note that defendants have not yet paid anything for the depositions where the Court had ordered defendants to pay. I will appreciate defendants taking care of this at their earliest convenience.

- I am also making a request to depose the two experts for whom defendants have submitted expert report. Please contact them and let me know about their availability and the fees that they will require for the expert depositions.

Sincerely yours,



William C. Reil

WCR/lf(Jackson,A/Mahoney021704)

cc: Dennis Herbert, Esquire  
Derrick Howard, Esquire  
John Rollins, Esquire

**EXHIBIT C**

WILLIAM C. REIL  
ATTORNEY AT LAW  
42 S. 15TH STREET, SUITE 210  
PHILADELPHIA, PA 19102

(215) 564-1635 ✓  
FAX (215) 564-4292 ✓

February 26, 2004

**BY FAX AND REGULAR MAIL**

Kathleen Mahoney, Esquire  
DiOrio & Sereni, LLP  
Front & Plum Streets  
P.O. Box 1789  
Media, PA 19063  
610-891-0652

Dennis Herbert, Esquire  
Kelly, McLaughlin  
620 W. Germantown Pike  
Suite 350  
Plymouth Meeting, PA 19462  
610-941-8133

Re: Arthur Jackson III v. Delaware County Prison, et al  
US District Court Civil Action Number: 02-3230

**Second Letter Regarding Expert Deposition of Plaintiff's Witnesses**

Dear Counsel:

With respect to deposition of plaintiff's five expert witnesses, you may send them a notice of deposition after paying their expert fees, as they require. Please send to me copies of any deposition notices, correspondence and payments to our experts. You have their addresses from our expert reports.

I have the following information on these experts: for Betsy Bates, BSN, CRRN, CCM, she charges a flat rate \$2,000 for depositions; for Dr. Andrew C. Verzilli, his hourly rate is \$175 for the deposition (including travel) with the fee of \$800 in advance; Lee Silverman, M.D., a Board Certified psychiatrist, requires \$4,000 in advance. I believe this information is correct, but you may need to verify their full requirements and availability. I have not received fees from any other experts at this time. When I receive them, I will pass them on to you.

By the way, I note that I have not heard from the defense regarding the payment of the Court-Ordered depositions at the Prison.

Sincerely yours,

William C. Reil

WCR/lf(Jackson,A/Counsel022604)

cc: Derrick Howard, Esquire  
John Rollins, Esquire

**EXHIBIT D**

KELLY, McLAUGHLIN, FOSTER,  
BRACAGLIA, DALY, TRABUCCO & WHITE, LLP

1617 JFK BOULEVARD  
SUITE 1690  
PHILADELPHIA, PA 19103-1815  
TELEPHONE: (215) 790-7900  
FAX: (215) 985-0675

DENNIS P. HERBERT  
ADMITTED IN PA & NJ  
[DHERBERT@LINKKMF.COM](mailto:DHERBERT@LINKKMF.COM)  
(610) 941-7923

ATTORNEYS AT LAW  
620 W. GERMANTOWN PIKE  
SUITE 350  
PLYMOUTH MEETING, PA 19462-1056  
—  
TELEPHONE (610) 941-7900  
FAX (610) 941-8133

900 HADDON AVENUE  
SUITE 332  
COLLINGSWOOD, NJ 08108-1908  
TELEPHONE: (856) 869-3100  
FAX: (856) 854-4233

OUR FILE: 17994

March 2, 2004

Daniel Gzesh, M.D.  
Neurology Associates, LTD.  
1514 Wolf Street  
Philadelphia, PA 19145

Re: Jackson v. Wackenhut, et.al

Dear Dr. Gzesh:

Attached please find a Notice of Deposition directing you to appear at the offices of Kelly, McLaughlin, Foster, Bracaglia, Daly, Trabucco and White, LLP, 620 W. Germantown Pike, Plymouth Meeting, PA 19462 on March 5, 2004 at 10:00 A.M. Please bring your entire medical file, including any films or tests, regarding any treatment or examination of Mr. Arthur Jackson, III, at any time, to the deposition.

As the Defendants in this matter have requested dates for your deposition from Mr. Jackson's attorneys and were given no answer, this notice has been forwarded to you for the final day of discovery, March 5, 2004. Although, as Defendants' attorneys, we would not normally contact you directly, we are faced with a deadline and do not expect Plaintiff's attorneys to convey a notice only sent to them. In addition, Plaintiff's attorneys have informed us that we would have to send notices directly to you.

Thank you for your attention in this matter.

Very truly yours,

**Kelly, McLaughlin, Foster,  
Bracaglia, Daly, Trabucco & White, LLP**

  
Dennis P. Herbert

DPH/lam

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ARTHUR JACKSON, III : CIVIL ACTION

vs :

DELAWARE COUNTY; WACKENHUT :  
CORRECTIONS CORPORATION C/O :  
PRENTICE HALL CORP.; WACKENHUT :  
CORPORATION; DELAWARE COUNTY :  
BOARD OF PRISON INSPECTORS; :  
CHARLES SEXTON, CHAIRMAN OF :  
DELAWARE COUNTY BOARD OF :  
PRISON INSPECTORS; GEORGE HILL, :  
SUPERINTENDENT OF DELAWARE :  
COUNTY PRISON (GEORGE W. HILL :  
CORRECTIONAL FACILITY); JAMES :  
JANECKA, WARDEN OF DELAWARE :  
COUNTY PRISON; DEBORAH :  
PERRETTA, HEALTH SERVICES :  
ADMINISTRATOR OF DELAWARE :  
COUNTY PRISON; MARGARET :  
CARRILLO, M.D., DELAWARE :  
COUNTY PRISON; DR. FREDERICK, :  
DELAWARE COUNTY PRISON; DR. :  
HOLLAND HULL, DELAWARE :  
COUNTY PRISON; MERIAN BYRD, :  
NURSE, DELAWARE COUNTY :  
PRISON; CAROL SNELL, NURSE, :  
DELAWARE COUNTY PRISON :  
:

NO. 02-3230

**NOTICE OF DEPOSITION**

**TO: Daniel Gzesh, M.D.  
Neurology Associates, LTD.  
1514 Wolf Street  
Philadelphia, PA 19145**

**PLEASE TAKE NOTICE** that on **March 5, 2004**, the undersigned will take the deposition of Plaintiff's expert, **Daniel Gzesh, M.D.**, beginning at **10:00 A.M.** at the law offices of Kelly, McLaughlin, Foster, Bracaglia, Daly, Trabucco & White, LLP, 620 W. Germantown Pike, Plymouth Meeting, PA 19462 before a notary public or some other officer authorized by law to administer oaths pursuant to the Pennsylvania Rules of Civil Procedure.

This deposition concerns Arthur Jackson, III and it is requested that Mr. Jackson's entire medical file be produced at this deposition.

**KELLY, McLAUGHLIN, FOSTER,  
BRACAGLIA, DALY, TRABUCCO & WHITE, LLP**

Dated: 3/2/04

By: DPH  
**Dennis P. Herbert, Esquire  
Attorney for Defendants, Wackenhut Corrections  
Corporation and Wackenhut Corporation**

**EXHIBIT E**

**KELLY, McLAUGHLIN, FOSTER,  
BRACAGLIA, DALY, TRABUCCO & WHITE, LLP**

1617 JFK BOULEVARD  
SUITE 1690  
PHILADELPHIA, PA 19103-1815  
TELEPHONE: (215) 790-7900  
FAX: (215) 985-0675

DENNIS P. HERBERT  
ADMITTED IN PA & NJ

DHERBERT@LINKKMF.COM  
(610) 941-7923

ATTORNEYS AT LAW  
620 W. GERMANTOWN PIKE  
SUITE 350  
PLYMOUTH MEETING, PA 19462-1056

TELEPHONE (610) 941-7900  
FAX (610) 941-8133

900 HADDON AVENUE  
SUITE 332  
COLLINGSWOOD, NJ 08108-1908  
TELEPHONE: (856) 869-3100  
FAX: (856) 854-4233

March 2, 2004

OUR FILE: 17994

Lee D. Silverman, M.D.  
Mercy Psychiatry Associates  
1503 Lansdowne Avenue  
Suite 3005  
Darby, PA 19023

**Re: Jackson v. Wackenhut, et.al**

Dear Dr. Silverman:

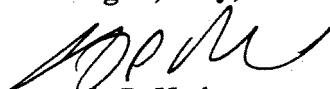
Attached please find a Notice of Deposition directing you to appear at the offices of Kelly, McLaughlin, Foster, Bracaglia, Daly, Trabucco and White, LLP, 620 W. Germantown Pike, Plymouth Meeting, PA 19462 on March 5, 2004 at 2:00 P.M. Please bring your entire medical file, including any films or tests, regarding any treatment or examination of Mr. Arthur Jackson, III, at any time, to the deposition.

As the Defendants in this matter have requested dates for your deposition from Mr. Jackson's attorneys and were given no answer, this notice has been forwarded to you for the final day of discovery, March 5, 2004. Although, as Defendants' attorneys, we would not normally contact you directly, we are faced with a deadline and do not expect Plaintiff's attorneys to convey a notice only sent to them. In addition, Plaintiff's attorneys have informed us that we would have to send notices directly to you.

Thank you for your attention in this matter..

Very truly yours,

**Kelly, McLaughlin, Foster,  
Bracaglia, Daly, Trabucco & White, LLP**



Dennis P. Herbert

DPH/lam  
Enclosure

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ARTHUR JACKSON, III : CIVIL ACTION

vs :

DELAWARE COUNTY; WACKENHUT :  
CORRECTIONS CORPORATION C/O :  
PRENTICE HALL CORP.; WACKENHUT :  
CORPORATION; DELAWARE COUNTY :  
BOARD OF PRISON INSPECTORS; :  
CHARLES SEXTON, CHAIRMAN OF :  
DELAWARE COUNTY BOARD OF :  
PRISON INSPECTORS; GEORGE HILL, :  
SUPERINTENDENT OF DELAWARE :  
COUNTY PRISON (GEORGE W. HILL :  
CORRECTIONAL FACILITY); JAMES :  
JANECKA, WARDEN OF DELAWARE :  
COUNTY PRISON; DEBORAH :  
PERRETTA, HEALTH SERVICES :  
ADMINISTRATOR OF DELAWARE :  
COUNTY PRISON; MARGARET :  
CARRILLO, M.D., DELAWARE :  
COUNTY PRISON; DR. FREDERICK, :  
DELAWARE COUNTY PRISON; DR. :  
HOLLAND HULL, DELAWARE :  
COUNTY PRISON; MERIAN BYRD, :  
NURSE, DELAWARE COUNTY :  
PRISON; CAROL SNELL, NURSE, :  
DELAWARE COUNTY PRISON :

NO. 02-3230

**NOTICE OF DEPOSITION**

**TO:** Lee D. Silverman, M.D.  
Mercy Psychiatry Associates  
1503 Lansdowne Avenue  
Suite 3005  
Darby, PA 19023

**PLEASE TAKE NOTICE** that on **March 5, 2004**, the undersigned will take the deposition of Plaintiff's expert, **Lee D. Silverman, M. D.**, beginning at **2:00 P.M.** at the law offices of Kelly, McLaughlin, Foster, Bracaglia, Daly, Trabucco & White, LLP, 620 W. Germantown Pike, Suite 350, Plymouth Meeting, PA 19462 before a notary public or some other officer authorized by law to administer oaths pursuant to the Pennsylvania Rules of Civil Procedure.

This deposition concerns Arthur Jackson III and it is requested that Mr. Jackson's entire medical file be produced at this deposition.

**KELLY, McLAUGHLIN, FOSTER,  
BRACAGLIA, DALY, TRABUCCO & WHITE, LLP**

By: D.P. Herbert

Dennis P. Herbert, Esquire  
Attorney for Defendants, Wackenhut Corrections  
Corporation and Wackenhut Corporation

Dated: 3/2/04

**EXHIBIT F**

WILLIAM C. REIL  
ATTORNEY AT LAW  
42 S. 15TH STREET, SUITE 210  
PHILADELPHIA, PA 19102

(215) 564-1635

FAX (215) 564-4292

March 2, 2004

**BY FAX AND REGULAR MAIL**  
610-941-8133

Dennis P. Herbert, Esquire  
Kelly, McLaughlin  
620 W. Germantown Pike  
Suite 350  
Plymouth Meeting, PA 19462

Re: Arthur Jackson III v. Delaware County Prison, et al  
US District Court Civil Action Number: 02-3230  
**Depositions for 3/5/04**

Dear Mr. Herbert:

I write to you concerning your unilateral notices of deposition with cover letter dated 3/2/04 for Friday, 3/5/04 with reference to Dr. Silverman and Dr. Gzesh. It is my understanding that neither Dr. Silverman nor Dr. Gzesh is available for depositions at your office on that day. I understand that you have not proffered fees to any experts for depositions or cleared any dates with them.

Accordingly, I am advising you that these depositions will not be able to go forward as you have scheduled. I note that you have had the expert reports and addresses of our experts for over a year. I will be out of town on 3/4/04 (and possibly 3/5/04) for a hearing in Bedford, PA, in the case of Commonwealth v. Chalfante.

Sincerely yours,

*Bill Reil*

William C. Reil

WCR/lf(Jackson,A/Herbert030204)m

cc: Derrick Howard, Esquire (by fax: 215-545-0423)  
John Rollins, Esquire (by fax: 215-545-0423)  
Kathleen Mahoney, Esquire (by fax: 610-891-0652)